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January 7, 2016

VIA E-MAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
Southern District of New York
United States Bankruptcy Court
One Bowling Green, Room 723
New York, NY 10004

Re: In re GMI USA Management, Inc., et al.
Chapter 11 Case No. 15-12552 (SMB) et al

Dear Judge Bernstein:

We represent Tsuneishi Group (Zhoushan) Shipbuilding, Inc. ("Tsuneishi"), which is a contract counterparty and/or party in interest to certain contracts Debtors seek to reject in their recently filed motions [Dkt. Nos. 189, 192, 195, 196, 197] (collectively, the "Motions"), in the above-referenced chapter 11 cases, which are pending before Your Honor.

I write, with the consent of counsel for the Debtors and counsel for the Official Committee of Unsecured Creditors ("Committee"), to request an extension of time for Tsuneishi to object or otherwise respond to the Motions, the objection date for was scheduled for January 6, 2016, and the hearing for which is currently scheduled for January 12, 2016 at 10:00 a.m. Both Debtors' counsel and Committee counsel are copied on this letter, and we note that by entering into this agreement regarding the extension, Tsuneishi is not submitting itself to this Court's jurisdiction.


Debtors and the Committee have agreed to an extension of time for Tsuneishi to respond to the Motions until January 8, 2016 at 5:00 p.m. ("Agreed Deadline"). Accordingly, we respectfully request an extension of time until the Agreed Deadline to allow Tsuneishi to object or otherwise



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respond to the Motions. As noted, both Debtors' counsel and Committee counsel have agreed to this extension.

Respectfully submitted,


Michael B. Schaedle /ms

MBS:lrd

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